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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MYUNG BIN CHUNG.

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,

Defendants.

Case No. 2:25-cv-00202-JHC

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

Noted for Consideration: June 2, 2025

For good cause, Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to continue to stay these proceedings until July 3, 2025. Plaintiff brings this litigation pursuant to the Mandamus Act seeking to compel the U.S. Citizenship and Immigration Services ("USCIS") to adjudicate her Form I-485, Application to Register Permanent Residence or Adjust Status. This case is currently stayed through June 3, 2025.

Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for

counsel, and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R. Civ. 2 P. 1. 3 With additional time, this case may be resolved without the need of further judicial 4 intervention. USCIS received Plaintiff's response to the Notice of Intent to Deny ("NOID") the 5 application on April 23, 2025. USCIS is finalizing its review of the application and is preparing to issue its decision shortly. As additional time is necessary for this to occur, the parties 6 7 respectfully request that the instant action continue to be stayed until July 3, 2025. The parties 8 will submit a joint status report on or before July 3, 2025. 9 DATED this 2nd day of June, 2025. 10 Respectfully submitted, 11 TEAL LUTHY MILLER Acting United States Attorney 12 s/ Michelle R. Lambert MICHELLE R. LAMBERT, NYS #4666657 13 **Assistant United States Attorney** United States Attorney's Office 14 Western District of Washington 1201 Pacific Avenue, Suite 700 15 Tacoma, Washington 98402 Phone: (253) 428-3800 16 (253) 428-3800 Fax: Email: michelle.lambert@usdoj.gov 17 18 Attorneys for Defendants 19 I certify that this memorandum contains 241 words, in compliance with the Local Civil 20 Rules. 21 s/ Myung Bin Chung MYUNG BIN CHUNG 22920 80th Park West 22

Edmonds, Washington 98026

Email: myungbin@gmail.com

Phone: 360-213-4916

Pro Se Plaintiff

STIPULATED MOTION & ORDER [Case No. 2:25-cv-00202-JHC] - 2

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ORDER

The case is held in abeyance until July 3, 2025. The parties shall submit a joint status report on or before July 3, 2025. It is so **ORDERED**.

DATED this 2nd day of June, 2025.

John H. Chun JOHN H. CHUN

United States District Judge